

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DOROTHY MANZY,

Plaintiff,

V.

**MONTGOMERY HOUSING
AUTHORITY, and LANE BOGGS, in his
individual capacity and official capacity,**

Defendants.

CASE NO. 2:05-cv-395-ID-SRW

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, the following attorneys have conferred regarding proposed deadlines in this case and submit the following joint report:

Norman Hurst, representing the Plaintiff;

Charles A. Stewart III and Angela R. Rogers, representing the Defendants.
2. **Pre-Discovery Disclosures.** The parties shall exchange the information required by Rule 26(a)(1) within 21 days of the entry of the Court's scheduling order.
3. **Discovery Plan.** The parties jointly propose the following discovery plan:
 - (1) All discovery commenced in time to be completed by March 1, 2006.
 - (2) Maximum of 10 depositions for the Plaintiff and 10 depositions for the Defendant, with a maximum time limit of 7 hours per deposition, unless extended by agreement of the parties. These limitations do not include depositions of witnesses designated below in Paragraph 4, Subsection 2, as experts. Each party is entitled to a deposition of each designated expert, not to exceed 7 hours per deposition.
 - (3) Maximum of 45 Interrogatories by each party, with responses due within thirty days after service.

- (4) Maximum of 20 Requests for Admissions by each party, with responses due within thirty days after service.
- (5) Maximum of 30 Requests for Production by each party, with responses due within thirty days after service.
- (6) Supplements under Federal Rule of Civil Procedure 26(e) are due 30 days before the close of discovery.

4. **Other Items.**

- (1) The parties do not request a conference with the Court before entry of the scheduling order.
- (2) Reports from retained experts under Federal Rule of Civil Procedure 26(a)(2) are due from the Plaintiff by October 1, 2005, and any such experts shall be made available for deposition by no later than October 31, 2005. Reports from retained experts from the Defendant are due by November 15, 2005, and any such experts shall be made available for deposition by not later than December 15, 2005.
- (3) The parties request a pretrial conference in April 2006.
- (4) All potentially dispositive motions should be filed by March 15, 2006.
- (5) Any motions to amend the pleadings or to join additional parties should be filed within 90 days of the entry of the Court's scheduling order.
- (6) Settlement and mediation cannot realistically be evaluated until the parties conduct further discovery.
- (7) Final list of trial witnesses and exhibits under Federal Rule of Civil Procedure 26(a)(3) must be served and filed:
 - a. By the Plaintiff: 30 days before trial; and
 - b. By the Defendant: 30 days before trial.
- (8) Objections are to be filed within 15 days after receipt of final list.
- (9) This case should be ready for trial at the Summer 2006 term.
- (10) Trial is expected to last 3 days.

The attorneys for the parties jointly prepared this Report of the Parties' Planning Meeting. Counsel for Plaintiffs and counsel for Defendant Nguyen have reviewed this report and given permission to the undersigned to file this report electronically with the Court on behalf of the parties.

Respectfully submitted this the 19th day of May, 2005.

s/ Charles A. Stewart III

Charles A. Stewart III (STE067)

Angela R. Rogers (RAI017)

Bradley Arant Rose & White LLP

Alabama Center for Commerce

401 Adams Avenue, Suite 780

Montgomery, AL 36104

Telephone: (334) 956-7700

Facsimile: (334) 956-7701

Attorneys for Defendants

Norman Hurst, Jr., Esq.

462-A Sayre Street

Montgomery, AL 36104

Telephone: (334) 269-6449

Facsimile: (334)

Attorney for Plaintiff